

EXHIBIT E. PUBLIC PARTICIPATION PLAN

South Wilbur Petroleum Contamination Site

Amended Public Participation Plan

Prepared by
The Washington State Department of Ecology

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1.0 INTRODUCTION

1.1 DOCUMENT ORGANIZATION

Section 1 provides an overview of the Amended Public Participation Plan (Plan), lists primary contact persons, and explains the Model Toxics Control Act (MTCA) and its requirement for a Public Participation Plan for those sites that must comply with MTCA.

Section 2 provides a description of the pertinent background and historical information including previous investigations and existing site conditions. In addition, this section describes contaminants of concern, land use and zoning.

Section 3 provides a background and profile on the community. A summary of community interviews and community concerns is also provided.

Section 4 describes the clean-up process and identifies the proposed activities that will meet the public involvement program.

Section 5 describes the public participation activities and provides an anticipated timeline for these activities.

Appendices: There are three appendices: Appendix A lists key public involvement contacts (mailing list); Appendix B provides the results of a community interview; and Appendix C is a glossary.

1.2 OVERVIEW OF AMENDED PUBLIC PARTICIPATION PLAN

The February 2001 Plan was developed by CH2M HILL Inc., Lincoln County Public Works (Lincoln County), and the Washington State Department of Ecology (Ecology) for the South Wilbur Petroleum Contamination Site located in Wilbur, Washington, and was updated by Ecology. As defined, the "Site" is located south of Goose Creek, west of Brace Street, north of Front Street, and east of the Wilbur Town Park. Site investigation and cleanup at this Site will focus on petroleum products (diesel and gasoline) in soil, shallow groundwater, and surface water of Goose Creek.

The Plan complies with the Washington State Model Toxics Control Act (MTCA) regulations (Chapter 173-340-600 WAC). The Potentially Liable Persons (PLPs) for cleanup at the site are Lincoln County, Washington State Department of Transportation (WSDOT), Lincoln Mutual No. 3, Joe and Tina Clark, and Jerome Clark. Lincoln County assumed the role of lead PLP and is coordinating and overseeing cleanup work at the Site.

This Amended Plan outlines public participation efforts that have and will occur for the South Wilbur Petroleum Contamination Site. These outreach efforts began at the remedial investigation and feasibility study stage of cleanup and will continue through implementation of the engineering design work (also known as the work plan). The Amended Plan may be changed, based on public comment and Ecology approval.

The purpose of the Plan is to promote public understanding of Ecology’s responsibilities, planning, and cleanup activities at hazardous waste sites. It also serves as a way of gathering information from the public that will help Ecology and Lincoln County continue cleanup of the Site that is protective of human health and the environment. The Plan will provide the community of Wilbur an opportunity to be informed regarding Site cleanup activities that have taken place and also contribute to the decision making process in the final stages of cleanup.

Documents relating to the investigation and cleanup may be reviewed at the repositories listed on page 10 of this Plan. If individuals are interested in knowing more about the Site, or have comments regarding the Amended Public Participation Plan, please contact one of the individuals listed in the following table:

Ms. Sandra Treccani Site Manager Washington State Department of Ecology Toxics Cleanup Program 4601 North Monroe Spokane, WA 99205 509-329-3412 E-mail: satr461@ecy.wa.gov	Carol Bergin Public Involvement Washington State Department of Ecology Toxics Cleanup Program 4601 North Monroe Spokane, WA 99205 509-329-3546 E-mail: cabe461@ecy.wa.gov
Bob Breshears Public Works Director and Engineer Lincoln County Public Works 27234 SR 25 N Davenport, WA 99122-0368 509-725-7041 E-mail: bbreshears@co.lincoln.wa.us	Mrs. Johnnie Landis Public Disclosure Washington State Department of Ecology 4601 North Monroe Spokane, WA 99205 509-329-3415 E-mail: johh461@ecy.wa.gov

1.3 PUBLIC PARTICIPATION AND THE MODEL TOXICS CONTROL ACT

The Model Toxics Control Act (MTCA) is a citizens’ initiative which passed in the November 1988 general election. It provides guidelines for the clean up of contaminated sites in Washington State. This law sets up strict standards to make sure the clean up of sites is protective of human health and the environment. The Department of Ecology’s Toxic Cleanup Program investigates reports of contamination that may threaten human health and the environment. If an investigation confirms the presence of contaminants, the site is ranked and placed on a Hazardous Sites List. Current or former owner(s) or operator(s) as well as any other potentially liable persons (PLPs) of a site may be held responsible for cleanup of contamination according to the standards set under MTCA. The PLPs are notified by Ecology that the site has contaminants and the process of cleanup begins with Ecology implementing and overseeing the project.

Public participation is an important part of the MTCA process during investigation and cleanup of sites. The participation needs are assessed at each site according to interest expressed by the public and degree of risk posed by contaminants. Individuals who live near the site, community groups, businesses, organizations and other interested parties are provided an opportunity to become

involved in commenting on the cleanup process. The Plan includes requirements for public notice such as: identifying reports about the site and the repositories where reports may be read; providing public comment periods; and holding public meetings or hearings. Other forms of participation may be interviews, citizen advisory groups, questionnaires, or workshops. Additionally, citizen groups living near contaminated sites may apply for public participation grants to receive technical assistance in understanding the investigation and cleanup process and to create additional public participation avenues. Ecology maintains responsibility for public participation at the site and Lincoln County will continue to assist with the coordination and implementation of these efforts.

2.0 SITE BACKGROUND

2.1 SITE DESCRIPTION

The Site is located within the Township of Wilbur, Washington (Figure 1). The Wilbur Site is located within the commercial district of Wilbur, south of the main business district and north of the Burlington Northern Railroad tracks (Figure 2).

The Site includes the former WSDOT maintenance facility and the adjacent Lincoln County Maintenance yard and facilities. It also includes to the east and across Anne Street, the former Lincoln Mutual No. 3 property that extends from Anne to Brace Street. Goose Creek borders the Site to the north, the City Park to the west, Front Avenue to the south, and Brace Street to the east. The neighboring land use is commercial, light industrial, and recreational including railroad operations, agricultural storage, bulk fueling facilities, and a public park.

The Site is relatively flat at an approximate elevation of 2,182 ft +msl (USGS, 1978, Wilbur 7.5 Minute Quadrangle) that slopes gently to the west, lying within the floodplain of Goose Creek. The Goose Creek channel borders the site to the north in a well-defined channel cut, approximately 6 feet deep (USDA, 1976, Goose Creek Watershed). There are no recognized stormwater or runoff controls apparent at the Wilbur Site.

2.2 SITE BACKGROUND

The Lincoln County and former WSDOT maintenance yards operated as vehicle maintenance, fueling and storage facilities from the 1930s through the present. The former Lincoln Mutual No. 3 site was historically used for fuel storage, maintenance, and vehicle fueling since at least the 1950s, as identified in aerial photographs. Figure 3 shows the approximate locations of fuel storage tanks and dispensing equipment that had been present at the site. Several of these historical fuel storage and dispensing features are potential sources for petroleum hydrocarbon impacts identified in previous investigations. A brief overview of these various fuel storage and dispensing features is presented below.

The Lincoln County maintenance yard is the former location of four underground storage tanks (UST). An 8,000 gallon diesel UST was located north of the south garage and was removed in 1992 by Lincoln County. A 500 gallon waste oil UST was located at the northwest corner of the south garage and was removed in 1990 by Lincoln County. A 500-gallon unleaded UST located on the west side of the south garage and a 550-gallon unleaded UST located at the

southwest corner of the south garage were both also removed in 1990 by Lincoln County. Undocumented releases from the two gasoline USTs reportedly have occurred at the site.

The former WSDOT maintenance yard is the former location of two USTs, two above ground storage tanks (ASTs), and a dry well receiving discharge from a sump located within the maintenance building. Two 1,000 gallon USTs, one diesel and the other gasoline, were located on the west and south side of the garage. The vehicle fueling dispenser was located at the property boundary facing Front Avenue. A 1,100 gallon diesel AST was located on the east and south side of the garage. The dispenser was located at the property boundary also facing Front Avenue for vehicle fueling. An out-of-service 5,000 gallon asphalt AST is located on the west side of the site. The sump was located approximately 32 feet north of the garage and was constructed of a 5 foot diameter concrete culvert. Evidence of petroleum hydrocarbons were found in both the floor sump of the garage and in the dry well. Additionally, undocumented releases are reported to have occurred from the two USTs, as well as impacted soil around the diesel AST, most likely due to dispenser releases.

The former Lincoln Mutual No. 3 site is the former location of a fueling island and dispenser pumps and a 1,900 gallon diesel AST. The fuel island is most likely the location of two ASTs as identified from the existing surface depressions, with a dispenser located between, as observed in aerial photographs. Undocumented releases have reportedly occurred from the dispenser location most likely resulting from dispenser lines leaks. The diesel AST was reportedly located on the earthen ramp. Vehicles were refueled adjacent to the ramp, while the tank was loaded from the ramp. Due to the length of service and type of fuel dispensing, this area is considered likely impacted by petroleum hydrocarbons.

2.3 LAND USE AND ZONING

The Wilbur Site and the adjacent properties are zoned commercial and have historically been used for commercial and light industrial with the exception of the park, which allows public access for picnics, use of playground equipment, swimming in the town pool, fishing during the Wild Goose Bill Days fishing derby, and other outside recreational activities. The adjacent properties include the Town Park to the west, United Grain Growers and Burlington Northern Santa Fe Railroad to the south across Front Avenue, and contractor garage and storage to the west and north across from Anne Street.

2.4 SITE HISTORY AND PREVIOUS INVESTIGATIONS

The following is a brief chronology of tank installation, tank removal, previous site investigations and source removal actions that have been conducted at the Site through 2000:

1952 - 1966: Washington State Department of Transportation (DOT) installs two 1000- gallon underground storage tanks for gas & diesel; 1,100 gallon diesel AST also located on site, but age of installation not known

1966 - 1979: Aerial photos imply that fuel dispenser and AST are present on the Lincoln Mutual property

- 1990: Lincoln County removes two 500 gal USTs (UL gas) and one 500 gal waste oil tank
- 1991: DOT removes two 1000 gallons USTs (gas & diesel)
- 1992: Lincoln County removes one 8000 gal diesel UST DOT performs sump characterization
- 1994: Vaughn Distributors (Lincoln Mutual) installs new fuel line; localized area of heavy fuel contamination observed
- 1995: DOT investigates dry well and conducts test pit exploration program; TPH contamination noted around 1,100 gallon AST (diesel) - tank removed
- 1996: DOT installs and samples four monitoring wells (MW-1 through MW-4) DOT removes dry well and seals garage sump
- 1997: DOT installs and samples monitoring wells MW-5 through MW-7 on Lincoln County parcel and performs a Geoprobe investigation for soil and shallow groundwater
- 1998: Ecology (SAIC) collects soil and shallow groundwater samples as part of a Strataprobe investigation
- 1999: Ecology conducts site ranking and adds site to the Site Register
- 2000: Agreed Order No. 00TCPER-1465 is signed (June 2000)
- 2002: RI/FS is completed by CH2M Hill for Lincoln County and report is accepted by Ecology

2.5 CONTAMINANTS OF CONCERN

Petroleum products including gasoline, diesel, and volatile components of petroleum products e.g., benzene, toluene, ethyl benzene and total xylene (BTEX) are present in groundwater and soil at the site.

Previous investigations indicate that the contamination came from fuel storage and dispensing activities. Contamination is localized, in general, to the Lincoln County maintenance yard, former WSDOT maintenance yard and the former Lincoln Mutual No. 3 site. Some petroleum-related contamination also has been identified in shallow groundwater beneath the town park, which lies immediately west of the former WSDOT maintenance yard. No direct observations of water quality impacts (petroleum sheen or documented petroleum hydrocarbons releases) have been reported for Goose Creek; limited surface water sampling of Goose Creek in 1998 found no evidence of petroleum hydrocarbon constituents in a water sample collected immediately downstream from the Site.

3.0 COMMUNITY BACKGROUND

Wilbur is a small rural town of approximately 895 people located between the towns of Creston and Almira on Highway 2 in Eastern Washington. It is also the “gateway” to Grand Coulee Dam where Highway 2 intersects Highway 174. It is nestled next to Goose Creek with basalt cliffs to the north and south of town.

Wilbur was named after its founding father Samuel Wilbur Condon, known as “Wild Goose Bill,” a name that was given to him after shooting into a flock of tame geese that he believed were wild. The town was originally incorporated under territorial law on May 25, 1889, but this incorporation was declared void when Washington became a state on November 11, 1889. However, local citizens immediately applied for legal incorporation, which was granted in August, 1890 (Wilbur Recreational Area 2000-2001 Visitor’s Guide, Wilbur Register).

3.1 COMMUNITY PROFILE

The Wilbur community is very “close knit.” It is a place where people generally know their neighbors and in some cases, families have lived in the area for up to five generations. The community is very involved in local school sports including football, volleyball, basketball, wrestling, track, baseball, and tennis. It is with great pride that Wilbur (with the assistance of nearby Creston students) usually place well in district and state tournaments as the Wildcats.

The community is also closely connected with natural resource industries (farming, ranching and timber). Lincoln County is known as the second largest wheat producing county in the nation. There are local grain growers’ cooperatives that own grain elevators for the storage of wheat, barley, and oats. Harvest usually occurs in late July and August, and during that time wheat trucks are commonly seen on local roads and on downtown streets. Many people work at the grain growers or other businesses that support the farmers including fertilizer companies, parts companies, insurance companies, and equipment dealers.

The people in the area also enjoy many recreational activities including swimming, boating and fishing on Lake Roosevelt to the north, and numerous creeks and “pot-hole” lakes in the surrounding areas, particularly to the south. Many people hunt the area looking for deer, upland birds, elk, and other animals. The Big Bend Golf and Country Club, located northwest of Wilbur, provides a nine-hole golf course near town. Emerson Park sports complex, located on the east end of town, has lighted tennis courts, a lighted football field, a track and baseball diamonds. There are also tourists that stop in town on their way to visit Grand Coulee Dam to the north or to visit Sun Lakes State Park and Dry Falls to the west.

3.2 COMMUNITY INTERVIEWS

When the South Wilbur Petroleum Contamination Site became known by the public, little or no concern was expressed, either by the local townspeople or by any organized community group. Given this limited degree of local public concern over the Site, only a few community interviews were conducted. These were conducted both to gather additional information for development of the

February 2001 Plan, and to determine if the public perception (and apparent level of concern) had changed.

Carla Shirley, Town Clerk, was updated on the status of the site on October 26, 2000 by CH2M HILL and she indicated, “although the Town of Wilbur would like to be kept informed of cleanup progress, the “town” was not too concerned about the site.” There was an implied understanding that Lincoln County would manage the contaminated site in a way that would adequately address any potential concerns of the local people, and provide an adequate appraisal of site cleanup progress (Refer to Appendix C for interview questions and answers).

Don Reid, Mayor of Wilbur, was selected for an interview on November 30, 2000. He confirmed that the community had only minimal concerns about the Site and trusted Lincoln County to manage the investigation and cleanup in a responsible manner (Refer to Appendix C for interview questions and answers).

Lori Mann was selected for an interview on January 18, 2001. She confirmed that she has confidence in Lincoln County and Ecology to manage the investigation and cleanup in a responsible manner (Refer to Appendix C for interview questions and answers).

Jean Seylor was also selected for an interview on January, 18, 2001. She confirmed that she has confidence in Lincoln County and Ecology to manage the investigation and cleanup in a responsible manner (Refer to Appendix C for interview questions and answers).

3.3 COMMUNITY CONCERNS

Based on discussions with Ecology; Ted Hopkins (Lincoln County Commissioner who represents this district), Carla Shirlye, and Don Reid, the primary community concerns were related to continued commercial use of the impacted properties, protection of Goose Creek, protection of the people who utilize the Town Park, and the ability to continue to sponsor the fishing derby that is held in the Park during “Wild Goose Bill Days.”

The public has been invited to comment on the cleanup during various stages since the February 2001 Plan. During the Remedial Investigation/Feasibility Study phase, one comment was received during the 30-day comment period. The Mayor requested Ecology keep him informed and updated about progress at the site and any issues affecting the park or buildings during excavation. The Mayor has been informed about the cleanup throughout the process.

During the comment period for the Draft Cleanup Action Plan and State Environmental Policy Act Determination of Non-Significance, one comment was received from the Washington State Department of Transportation. Responses to these technical comments are found in the Responsiveness Summary prepared by Ecology and dated May 6, 2003. The summary may be reviewed at Ecology’s Eastern Regional Office, 4601 N. Monroe, Spokane, Washington.

4.0 SITE CLEANUP PROCESS

4.1 AGREED ORDER

The Agreed Order to perform a Remedial Investigation/Feasibility Study (RI/FS) is a legal document formalizing the agreement between Ecology and the potentially liable persons (PLPs) to ensure cleanup activities are conducted appropriately. The Order is completed under the authority of the Model Toxics Control Act (MTCA) Chapter 70.105D RCW. Lincoln County has assumed responsibility of the RI/FS process as the lead PLP.

4.2 REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS)

The purpose of the Remedial Investigation/Feasibility Study (RI/FS) is to collect, develop and evaluate information regarding petroleum contamination in affected areas on and off site. The RI defines the type, extent and degree of known soil and shallow ground water contamination, and assesses potential impacts to surface water and sediments in Goose Creek. The FS identifies, evaluates and proposes alternative cleanup actions.

4.3 CLEANUP ACTION PLAN (CAP)

The purpose of the CAP is to select the cleanup action, outline the standards and other requirements necessary to complete cleanup at the site. Ecology has selected source removal with engineering controls and enhanced bioremediation for the cleanup. The following are the primary actions that will take place at the site to cleanup petroleum contamination in soil and groundwater:

- Remove contaminated soil and treat it off-site
- Fill areas where contaminated soil has been removed with a mix of clean soil and an oxygen releasing compound
- Install engineering controls, including asphalt pavement and stormwater controls; and install a phytoremediation barrier on the north and west sides of the site
- Placing restrictions on the property to limit access and protect potential receptors from any potential contamination that may temporarily remain after the cleanup. This will maintain the integrity of the cleanup action.

4.4 STATE ENVIRONMENTAL POLICY ACT AND DETERMINATION OF NON-SIGNIFICANCE (SEPA DNS)

The State Environmental Policy Act, known as SEPA requires governmental agencies to consider potential environmental impacts of a project. After review of a completed environmental checklist and other site specific information, Ecology has determined the cleanup of petroleum products at the site will not have a probable adverse impact on the environment. This cleanup action will benefit the environment by reducing and eventually eliminating the release of toxic chemicals from the site. Therefore, Ecology has issued a Determination of Non-Significance.